

Federal Defenders
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BY ECF

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Virginia Lemus Recinos
23 Cr. 464 (AS)

Dear Judge Subramanian:

I write on behalf of both parties to request a final 30-day adjournment of the status conference scheduled for Friday, October 18, 2024. As set forth in our previous letters, the parties have been working to reach a resolution in this matter short of trial. Since the last adjournment, the government has agreed to give one last consideration to the defendant's request for deferred prosecution, and due to scheduling issues, we require an additional 30-day adjournment to finalize that process. This is the sixth joint or unopposed request for an adjournment. The past requests were granted to allow the defense to prepare its deferred prosecution submission, for defense counsel to familiarize herself with the case after taking over from prior counsel (who is on parental leave), for the government to consider the defendant's request, and for the parties to discuss alternative resolutions beyond deferred prosecution. The defense consents to the exclusion of time under the Speedy Trial Act until the date of the next conference.

Finally, should the Court decline to grant a 30-day adjournment, I nevertheless request a brief adjournment because I am scheduled to be out of the District on travel related to another matter October 17-18, 2024.

Respectfully submitted,

/s/
Hannah McCrea
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CC: AUSA Edward Robinson